

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

RADIANT IMAGES, INC,	:	
and GIANNA WOLFE	:	
Plaintiffs,	:	1:18-cv-01492 (LAK)
	:	
v.	:	
	:	DECLARATION OF
COMPLETE BUSINESS SOLUTIONS	:	NORMAN M. VALZ
GROUP, INC., BROADWAY ADVANCE	:	AS TO ATTACHED
FUNDING, LLC, JOHN and JANE DOE	:	EXHIBITS IN SUPPORT OF
INVESTORS	:	MOTION TO DISMISS
Defendants,	:	

NORMAN M. VALZ, ESQ., an attorney duly licensed to practice law before this Court, declares and affirms the truth of the following under penalty of perjury:

The following Exhibits are to be attached to Defendants’ Motion to Dismiss Plaintiffs’ Complaint. I can attest to these documents being retrieved from the respective Defendants’ storage used during the normal course of business and as being accurate and fair copies of said documents to the best of my knowledge and belief.

1. Exhibit A – November 25, 2015 Agreement between Plaintiffs and Complete Business Solutions Group, Inc.,(hereinafter in the alternative “CBSG”) wherein Plaintiff, Radiant Images, Inc. accepted \$120,000.00 from CBSG selling it \$170,000.00 in receivables;
2. Exhibit B – June 7, 2016 Agreement between Plaintiffs and CBSG wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$345,000.00 in receivables;
3. Exhibit C – September 8, 2016 Agreement between Plaintiffs and CBSG wherein Plaintiff, Radiant Images, Inc. accepted \$100,000.00 from CBSG selling it \$135,000.00 in receivables;
4. Exhibit D – December 1, 2016 Agreement between Plaintiffs and CBSG wherein Plaintiff, Radiant Images, Inc. accepted \$150,000.00 from CBSG selling it \$202,500.00 in receivables;
5. Exhibit E – January 23, 2017 Agreement between Plaintiffs and CBSG wherein Plaintiff, Radiant

Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;

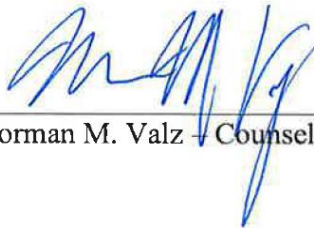
6. Exhibit F – February 7, 2017 Agreement between Plaintiffs and CBSG wherein Plaintiff, Radiant Images, Inc. accepted \$150,000.00 from CBSG selling it \$202,500.00 in receivables;
7. Exhibit G – March 28, 2017 Agreement between Plaintiffs and CBSG wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;
8. Exhibit H – April 26, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$332,500.00 in receivables;
9. Exhibit I – June 29, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;
10. Exhibit J – August 15, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;
11. Exhibit K – September 13, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;
12. Exhibit L – September 20, 2017 Agreement between Plaintiffs and Fast Advance Funding wherein Plaintiff, Radiant Images, Inc. accepted \$500,000.00 from CBSG selling it \$915,947.63 in receivables;
13. Exhibit M – November 20, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;
14. Exhibit N – December 6, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables;
15. Exhibit O – December 15, 2017 Agreement between Plaintiffs and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$394,450.00 from CBSG selling it \$532,507.50 in receivables;

16. Exhibit P – January 4, 2018 Agreement between Plaintiff and Broadway Advance wherein Plaintiff, Radiant Images, Inc. accepted \$100,000.00 from CBSG selling it \$135,000.00 in receivables; and
 17. Exhibit Q – January 17, 2018, Agreement between Plaintiff and Broadway Advance wherein Plaintiff accepted \$250,000.00 from CBSG selling it \$337,500.00 in receivables.
1. I declare under penalty of perjury that the foregoing is true and correct.

Philadelphia, Pennsylvania
March 2, 2018



Notary Public



Norman M. Valz – Counsel of Record

